

Data Submitted (UTC 11): 2/14/2025 1:32:27 AM

First name: Tisa

Last name: Becker

Organization:

Title:

Comments: I am writing to you today regarding a the Tongass Draft Assessment findings

Dear Tongass Plan Revision,

I am writing to express my deep concerns regarding the Draft Species of Conservation Concern Assessment and the lack of comprehensive planning for salmon and fisheries management within the Tongass National Forest. As a commercial fisherman with 27 years of experience in the industry, an educator with a background in curriculum development, and someone whose family has served in forestry and natural resource policy, I am deeply troubled by the direction of current management strategies.

The federal halibut fishery in Area 3A has recently suffered a 20% reduction, yet the federal government continues to mismanage groundfish by allowing trawling and dragging operations to take massive bycatch allocations. These destructive practices not only devastate Chinook salmon stocks but also result in the incidental catch of whales. There is a stark lack of cohesion between fisheries management and ecosystem sustainability. The Tongass National Forest Plan should acknowledge the critical role of fisheries in sustaining local communities and ecosystems, yet the current draft fails to address these pressing concerns.

Furthermore, the draft assessment does not incorporate any meaningful coordination with the Alaska Board of Fisheries. The Board of Fisheries and the Commissioner of Fish and Game have recently prioritized sport fishing interests over the sustainability of commercial and subsistence fisheries. The sport fishing community, despite its significant impact on fish populations, does not contribute to enforcement funding, nor does it operate under observer requirements. This lack of accountability results in unchecked overharvest, particularly in high-traffic areas within the Tongass. The growing tourism industry, which fuels sport fishing, is disproportionately depleting critical fish stocks, including salmon, halibut, and black cod.

In places like Hoonah, a historically Native village within the Tongass, residents are forced to travel to Point Adolphus to hunt deer, as the influx of sport hunters has severely impacted local wildlife populations. The current allocation system does not accurately reflect the actual take by visitors, creating unsustainable pressure on fisheries and game resources. The Forest Plan must recognize and address the detrimental effects of unregulated sport fishing and hunting, as well as the economic and cultural losses faced by subsistence users. The 2012 Planning Rule mandates that the Forest Service coordinate with tribes, agencies, and the public to ensure the protection of species of concern. However, the draft assessment does not reflect meaningful engagement with stakeholders who depend on these resources for their livelihood. Fisheries management within the Tongass must align with broader conservation goals, taking into account the cumulative impacts of bycatch, overharvest, and habitat degradation.

I urge you to revisit the assessment and integrate a more holistic approach to fisheries and wildlife management that includes stronger conservation measures, increased enforcement for sport fishing, and a reevaluation of allocations to ensure sustainability. Without such measures, we risk not only the collapse of key fisheries but also the erosion of the traditional ways of life for many Alaska Native communities.

The draft assessment highlights several priority areas for me personally that are also areas which require robust protection, including:

- Homelands, sacred places, and traditional harvesting grounds of Alaska Native people
- Subsistence - both customary and traditional uses
- The temperate rainforest archipelago and ecosystems
- Salmon runs and other wildlife habitat
- Recreation and scenic beauty

Sincerely,
Mrs. Tisa Becker
PO Box 240369 Douglas, AK 99824-0369
tisabecker@gmail.com